

Welcome to the 2016 SFSP Sponsor Training for Closed Sites. Notice the chat box on the right side of your screen – we will use this tool for questions and answers at the conclusion of the training, so please feel free to note any issues or areas of concern that come up as we move through the training. Finally, note the handouts available in the top right area of the screen. Whether you're viewing this live or watching the recorded version, those handouts will be available for you to download if you'd like and we will note which slides have accompanying handouts with "handout" written in green in the bottom right or left corner of the slide.. Now, let's get started.

Sponsor Responsibilities

Attend State Agency (SA) training

Hire, train and supervise staff

Arrange meal service (preparation, delivery)

Monitor sites

Prepare claims for reimbursement

As we know, SFSP's puropse is to provide nutritious meals to children, but it comes with regulations to ensure the program is not taken advantage of. In order to maintain program integrity and to ensure that sponsors are allowed to continue serving their communities by operating the program, SFSP Sponsors have a variety of responsibilities. You are fulfilling part of your Sponsor responsibilities by participating in this training. Sponsors are also responsible for hiring, training and supervising staff, for arranging meal service, for monitorign sites and for preparing claims for reimbursement.



Closed enrolled sites & eligibility

Regulatory & Monitoring Requirements

Procurement & Reimbursement

Staff Training

The agenda for today's training includes covering what closed enrolled sites are and how they are eligible for the SFSP. We'll also talk about the regulatory and monitoring requirements for Sponsors of closed enrolled sites, well discuss procurement and reimbursement for the program, and finally we'll cover staff training. Let's get started with a closer look at closed enrolled site and eligibility.

Closed Enrolled Sites

Established in these locations:

- Identified group of needy children in "pocket of poverty"
- Identified group of low-income children transported to congregate meal site in area <50% F/R eligibility
- Program that provides organized activities (e.g. recreation, cultural, religious)

Closed enrolled sites serve an identified group of needy children either in a "pocket of poverty" or a group of low-income children is transported to a congregate meal site that is non in a "pocket of poverty" where at least 50% of children qualify to receive free- or reduced-price school meals. The Sponsoring organization provides organized programs or activities, which may be recreational, cultural or religious, for example.

Closed Enrolled Sites

Meal reimbursement:

- One or two meals per day

Breakfast	Snack
Lunch	Supper
Breakfast & Snack	Lunch & Snack
Breakfast & Lunch	Supper & Snack
Breakfast & Supper	Two snacks

Closed enrolled sites are allowed to claim one or two meals per day and one of the combinations in this table. They can claim any single meal or snack and a few combinations of meals and snacks, but not all combinations are allowed.

Closed Enrolled Sites

Open <u>ONLY</u> to children enrolled in a program

NOT for the community at large

*Summer school CANNOT be closed enrolled sites

Closed enrolled sites are open to serve SFSP meals only to children enrolled in the Sponsor's program. This is not designed for the community at large. Please note than summer school does not qualify to operate as a closed enrolled site, so if a Sponsor offers a program where only children receiving academic credit are allowed, it cannot operate as an SFSP closed enrolled site.

Eligibility

Two ways:

- 1. Individual application for each child enrolled in/attending the program
 - Collect household applications (see handout)
 - Eligibility status from school operating NSLP or SBP
 - Federal Head Start/Early Head Start automatically qualify

Eligibility for closed sites can be verified in two ways: sponsors can collect individual income applications for each child enrolled or through area eligibility. Individual eligibility can be determined in a few ways: Sponsors can have participants complete the income eligibility form (or IEF), Sponsors can get a list of enrolled children's eligibility status from their school as long as the school participates in the school lunch or school breakfast program, or, for young children, by a Head Start or Early Head Start application. Sponsors must ensure that at least half of the children enrolled in and attending their program qualify to receive free- or reduced-price meals. This means that the minimum 50% free/reduced eligibility of children in attendance must be maintained for each month of operation. If you choose to collect eligibility information for each participant, please use the current income eligibility form available for download from the right side of the screen.

Eligibility

Individual applications:

- At least 50% of children enrolled/attending must qualify for free/reduced meals
 - Monitor that 50% threshold is maintained throughout SFSP operation
- Participant eligibility updated annually
 - Cannot be more than 12 months old
 - e.g. form signed and dated by Sponsor June 1, 2015 is good through June 30, 2016

SFSP Memo 01-2015: Duration of Income Eligibility Determinations: Guidance and Q&As, Oct 31, 2014

Remember that sponsors of closed enrolled sites must ensure that at least 50% of their enrolled participants qualify for free- or reduced-price meals throughout the SFSP operation. Sponsors cannot claim meals for any month in which fewer than 50% of the children receiving meals qualify for free- or reduced-price meals. So although Sponsor enrollment may have more than 50% qualify for free or reduced meals, Sponsors must still ensure that for each month they serve and claim meals for reimbursement at least 50% of the children receiving those meals qualify for free or reduced-price meals.

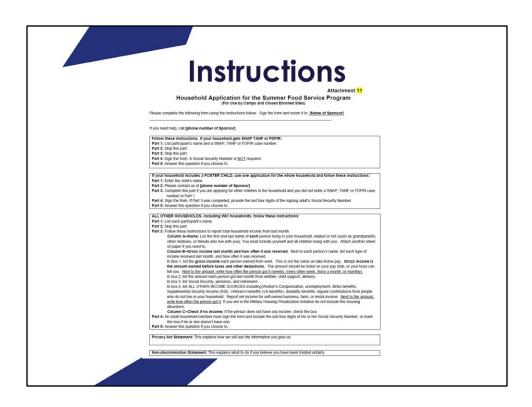
Also, remember that documentation for each participant's eligibility must be updated annually and cannot be older than 12 months.

Eligibility Application

- Three pages
 - Instructions
 - Income Eligibility Form
 - Non-discrimination statement

Handout

Our Income Eligibility Application includes three pages: first, an instructions page, second the form used to verify eligibility, and last the non-discrimination statement. Let's take a look at each of the three parts now...



Here, we see the instructions for completing the Income Eligibility Form, or IEF. Please provide this with the IEF to all participants of your program if you use this to document eligibility for SFSP.

run	† 1 & Part 2
	Attachment 10
SUM	INCOME ELIGIBILITY FORM FOR THE IMER FOOD SERVICE PROGRAM se by Camps and Closed Enrolled Sites)
•	uctions below. Sign the form and return it to: [Name of Sponsor]
Part 1. Children enrolled in Camp or Closed Names (First, Middle Initial, Last) Joey Smith	SNAP, TANF or FDPIR case # (if any). Skip to Part 4 i you listed a case #.
Sammy Jones - foster	
Part 2. Foster Child	d-price meals regardless of household income. If a foster child lives with you

Let's take a look at the Income Eligibility Form in more detail. All parts except for Part 6 must be completed by a parent or guardian in the household. Write the the full name of each child enrolled in the Sponsors program in part 1. This is also the part where categorical eligibility is documented, if it applies. Categorical eligibility is based on whether a child receives SNAP, TANF or FDPIR, which are food stamps, temporary assistance to needy families or food distribution program on indian reservations, respectively. If guardians or parents indicate that the child does receive SNAP, TANF or FDPIR, Sponsors must ensure that a full case number, usually a six-digit number, is recorded on the IEF and that the parent or guardian completes this portion of the form. A case number is not the same as the number on the front of the EBT card. Foster children automatically qualify for Free meals in Child Nutrition Programs, including the SFSP. As the form instructs parents, they are to notify you, the Sponsor, if they have a foster child. In this case, please instruct parents or guardians to write the foster child's name in part one, along with other children in the household, with "foster" behind the child's name.

	Part	3 & P	art 4		
Part 3. Total Household Gro A. Name List everyone in household,	B. Gross income and Example: \$100/month	how often it was re ly \$100/twice a mo		week \$100/weekly	C. Check
ncluding children)	before deductions	support, alimony	pensions, retirement.	4. All Other Income	
Example) Jane Smith	\$200/weekly	\$150/weekly	\$100/monthly	\$/	
Joey Smith	\$/	\$/	\$/	\$/	X
85	\$/	\$/	\$/	\$/	
	\$/	\$/	\$/	\$/	
Part 4. Signature and Social An adult household member digits of his or her Social Set Statement on the back of this I certify that all information or given for the receipt of Fedei purposely give false informat	must sign this form. If Pocurity Number or mark th s page.) n this form is true and the ral funds. I understand the tion, the participant recei	art 3 is completed, the "I do not have a Si at all income is repo at SFSP officials ma ving meals may lose	ocial Security Number" rted. I understand that t ay verify the information to the meal benefits, and	box. (See Privacy Adherence of the Information is being I understand that if I may be prosecuted	ing I
Sign here: X Address:	Pri	nt name:	Phone Number:	Date:	
Last four digits of Social Sec	urity Number:	☐ I do not have	a Social Security Num	ber	_

All other household members should be listed in Part 3, where each of their incomes is recorded. Please be sure that household members' incomes include the frequency of receiving that income - it is NOT OK to assume a frequency. Also, instruct guardians to indicate those household members that have NO income to check the box under letter "C".

Finally, parents or guardians must sign and date the form and provide the last four digits of their social security number or check the box for no number.

Part 5 & Part 6					
Part 5. Participant's ethnic and	l racial identities	(optional)			
Mark one ethnic identity:		re racial identities:			
☐ Hispanic or Latino	Asian	☐ American Indian or Alaska Native			
☐ Not Hispanic or Latino	☐ White	☐ Native Hawaiian or Other Pacific Islander			
 	Black or African American				
Don't fill out this part. This is f					
		eekly x 52, Every 2 Weeks x 26, Twice A Month x 24, Monthly x 12			
Total Income: Pe	er: 🛘 Week, 🗘 Eve	ery 2 Weeks, □ Twice A Month, □ Month, □ Year			
	Withdrawn:	Eligibility: Free Reduced Denied			
Reason:	withdrawn.	Eligibility. 1 ree Reduced Defiled			
Determining Official's Signature:		Date:			
	Confirming Official's Signature: Date:				
Follow-up Official's Signature:	Follow-up Official's Signature: Date:				

Part 5, where ethnicity and racial information is gathered, is optional.

And, finally, the last part is for Sponsors use ONLY. The Sponsor determining official must total the household income and indicate the frequency, must total the household size by adding all participants listed in Part 1 with other household members listed in part 3. Based on total income and frequency and the household size, the current fiscal year income guidelines will be used to determine eligibility. Or, if a child receives SNAP, TANF or FDPIR, the line next to Categorical Eligibility will be marked and the household size and income are not used to make an eligibility determination. Finally, the Sponsor determining official must sign and date the form. It is IMPORTANT to make all participant eligibility determinations well in advance of meal service start date to ensure that that the 50% free/reduced eligibility threshold is met.

NUTRITION SERVICES INCOME ELIGIBILITY GUIDELINES

JULY 1, 2015 - JUNE 30, 2016

Household Size						Redi	uced Price M	eals		
	Annual	Monthly	Twice per Month	Every Two Weeks	Weekly	Annual	Monthly	Twice per Month	Every Two Weeks	Weekly
1	15,301	1,276	638	589	295	21,775	1,815	908	838	419
2	20,709	1,726	863	797	399	29,471	2,456	1,228	1,134	567
3	26,117	2,177	1,089	1,005	503	37,167	3,098	1,549	1,430	715
4	31,525	2,628	1,314	1,213	607	44,863	3,739	1,870	1,726	863
5	36,933	3,078	1,539	1,421	711	52,559	4,380	2,190	2,022	1,011
6	42,341	3,529	1,765	1,629	815	60,255	5,022	2,511	2,318	1,159
7	47,749	3,980	1,990	1,837	919	67,951	5,663	2,832	2,614	1,307
8	53,157	4,430	2,215	2,045	1,023	75,647	6,304	3,152	2,910	1,455
For each additional family member add:	5,408	451	226	208	104	7,696	642	321	296	148

If households report multiple frequencies of pay, total income must be calculated on an annual basis. Use the following conversions: Annual Income Conversion: Weekly X 52; Every 2 Weeks X 26; Twice a Month X 24; Monthly X 12

Non-discrimination Statement

The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not, we cannot approve your child for free or reduced-price meals. You must include the social security number of the adult household member who signs the application. The social security number is not required when you apply on behalf of a foster child or you list a SNAP, Temporary Assistance for Needy Families (TANF) Program or Food Distribution Program on Indian Reservations (FDPIR) case number for your child or other (FDPIR) identifier or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced-price meals, and for administration and enforcement of the Program.

Non-discrimination Statement: In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retailation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits, Individuals who are deaf, hard of hearing, or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gow/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 832-9992. Submit your completed form or letter to USDA by; (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax; (202) 690-7442; or (3) email: program.intake@usda.gov/

This institution is an equal opportunity provide

Here, we see page three of the income eligibility application, which includes the current nondiscrimination statement. This page MUST be provided to all participants who receive an income eligibility form for the SFSP.

Other Languages http://www.fns.usda.gov/cnd/Application/familyfriendlyapps.html

The IEF is available in a variety of languages. Please visit the website above to access the translations that fit your needs.

Eligibility

2. Area eligibility

- http://www.fns.usda.gov/areaeligibility
- Zoning Commissions
- Departments of Welfare
- USDA's Rural Development Housing Authority
- HUD Housing Authority
- Local Housing Authority

*Camps may not use area eligibility

SFSP Memo: Waiver for Closed Enrolled Sites, Nov 17, 2002)

We can also determine closed site eligibility by census data. In this case, individual income applications would NOT need to be collected for the participants enrolled in your program. You can determine eligibility based on census data by visiting the USDA Area Eligibility Map. Let's take a look at that now...

As a reminder, camps (residential or non-residential) may not use area eligibility to establish site eligibility.

Camps

For-profit sites or for-profit camps NOT eligible to participate in SFSP

Residential/non-residential

Food service is part of organized program

Collect and maintain individual participant applications

Residential and non-residential camps have food service is part of organized program of regularly scheduled activities. They are required to collect and maintain individual participant applications and are reimbursed only for meals served to children who qualify for free- or reduced-price meals.

Camps

Allowed to claim up to three meals per day

- Breakfast, lunch & supper
- Breakfast, lunch & snack
- Lunch, supper & snack
- Any combination of meals or snacks less than maximum allowed

Camps are allowed to claim reimbursement for up to three meals each day. Allowable combinations include breakfast, lunch & supper; breakfast, lunch & snack; lunch, supper & snack; or any combination of meals or snacks that is less than the maximum described above.

Camps

Reimbursed only for meals served to children who qualify for free- or reduced-price meals

Do not have to meet 50% Free/Reduced threshold

 Reimbursed ONLY for meals served to participants who qualify for Free/Reduced meals

Camps operating as closed enrolled sites are eligible to claim only the meals served to participants who qualify for free- or reduced-price meals.

Upward Bound

Automatically qualifies for SFSP if serve ONLY Upward Bound students

2/3 must be low-income per Upward Bound regulation

Ensure eligibility with documentation from Upward Bound grantee

- Do not need separate SFSP IEF/application

SFSP Memo 06-2015: Categorical Eligibility in the SFSP, Dec 8, 2014

Upward Bound programs that serve ONLY Upward Bound participants automatically qualify to operate as closed enrolled sites and DO NOT need to maintain eligibility verification by Income Eligibility Form for each participants. Upward Bound regulations require that at least two-thirds of participants be low-income. If the Upward Bound Sponsor has documentation of each participant's eligibility from its Upward Bound grantee then individual IEFs or income eligibility applications do not need to be gathered from participants. Remember, Upward Bound SFSP Sponsors, you must maintain this eligibility information on site and it must be available for review by State Agency personnel at any time.

Upward Bound

Serve both Upward Bound and non-Upward Bound participants:

- Keep eligibility applications to ensure ≥50% qualify for free/reduced meals
- Maintain current IEFs (see handout)
 - Not more than 12 months old

For programs that serve both Upward Bound and non-Upward Bound participants, sponsors must maintain current Income Eligibility Forms for each participant and must ensure that at least half of participants qualify to receive free- or reduced-price meals.

Agenda

Closed enrolled sites & eligibility

Regulatory & Monitoring Requirements

Procurement & Reimbursement

Staff Training

Breakfast

1 Milk	1 cup (8 oz)	Fluid milk
1 Fruit/Vegetable	½ cup	Juice (100% juice) or fresh/frozen/canned fruit or vegetable
1 Grain	1 slice 1 serving ¾ cup ½ cup ½ cup	Bread or Corn bread/biscuit/roll/muffi n or Cold dry cereal or Hot cooked cereal or Pasta/noodles/grains (cooked)

Breads and grains must be made from whole-grain or enriched meal or flour.

Cereal must be whole-grain or enriched or fortified.

Meal requirements for the summer food program mandate that each meal served meet specific requirements for food components. Breakfast requires three components: fluid milk, a fruit or vegetable (If using juice it must be 100% juice), and at least one grain item. Note grain items must be made from whole grain or enriched meal or flour. Cereals must be whole grain, enriched or fortified.

1 Milk	1 cup (8 oz)	Fluid milk
2 Fruit/Vegetable	¾ cup	Juice (100% juice) or fresh/frozen/canned fruit or vegetable (two different fruit/vegetables items)
1 Grain	1 slice 1 serving ½ cup ½ cup	Bread or Corn bread/biscuit/roll/muffin or Hot cooked cereal or Pasta/noodles/grains (cooked)
1 Meat/Meat Alternate	2 oz 2 oz 2 oz 1 large ½ cup ¼ cup 1 oz 8 oz	Lean meat/poultry/fish or Alternate protein product or Cheese or Egg or Cooked dry beans/peas or Peanut butter or other nut/seed butter or Nuts/seeds or Yogurt

Lunch and supper require five items from four food components: 1 cup fluid milk, 2 different fruits and/or vegetables, 1 grain serving and 2 oz serving of meat/meat alternate.

Snack					
select two of the four components					
1 Milk	1 cup (8 oz)	Fluid milk			
1 Fruit/Vegetable	³ / ₄ cup	Juice (100% juice) or fresh/frozen/canned fruit or vegetable (two different fruit/vegetables items)			
1 Grain	1 slice 1 serving % cup ½ cup ½ cup	Bread or Corn bread/biscuit/roll/muffin or Cold dry cereal or Hot cooked cereal or Pasta/noodles/grains (cooked)			
1 Meat/Meat Alternate	1 oz 1 oz 1 oz ½ large ¼ cup 2 Tbsp cup 1 oz 4 oz	Lean meat/poultry/fish or Alternate protein product or Cheese or Egg or Cooked dry beans/peas or Peanut butter or other nut/seed butter or Nuts/seeds or Yogurt			
	Freads and grains must be made from whole-grain or enriched meal or flour. Cereal must be whole-grain or enriched or fortified.				

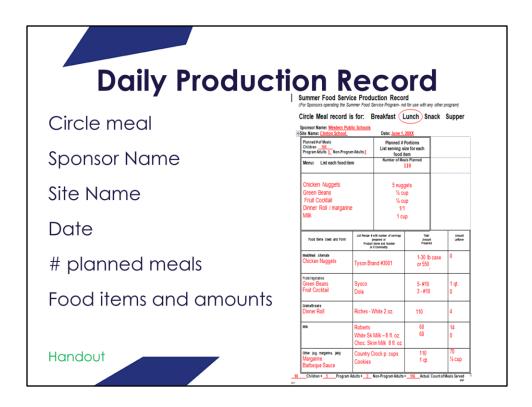
Snacks require two serving of the four components in the required portion sizes – remember you can not serve two items from the same group. For example bread and crackers, You also can not serve milk and juice at snack

Daily Production Records

Required record for EACH day of meal service:

- Full date example: Friday, June 3, 2016
- Indication of which meal prepared
- Exact amounts and food items PREPARED

All sponsors are required to maintain production records for each day and each meal that is served. These MUST be completed while the meal is being prepared or immediately after preparation is finished. It is NOT ok to complete these in advance or the next day. These documents require the full date, indication of which meal is being prepared, and exact foods and amounts prepared.



Here, we see an example of a completed production record where the meal is circled, the sponsor and site names are indicated, the full date is written, as well as the # of meals planned and food items and amounts. There is a blank production record available for download from the list on the right.

Vended Meals

Submit copies of cycle menu to NDE

Retain copies of delivery tickets

Daily Point-Of-Service

Required record for EACH day of meal service:

- Full date example: Friday, June 3, 2016
- Which meal served
- Roster of children enrolled with record of exactly which children receive reimbursable meal

Handout

Sponsors are also responsible for maintaining daily point of service counts. These must be completed as each child receives his/her reimbursable meal with all required components. Complete point-of-service records include the full date, which meal was served, and the number of children who received a reimbursable meal. Note that closed enrolled programs MUST keep a roster of enrolled children and must make daily meal counts using that roster – the Sponsor and the State Agency need to know exactly which children received meals on any given day in order to confirm that at least half of the children receiving meals qualify to receive free- or reduced-price meals.

Sponsor Responsibilities at Sites

NEW sites:

Pre-operational site selection form

Preapproval visit

- completed with NDE (State Agency) staff

Handout

In addition to the daily records of meals served and number of reimbursable meals, and documentation of procurement, Sponsors are required to maintain specific annual documentation from each site they operate. For new sites, this documentation includes the pre-operational site selection form (one of the attachments that you can download). Sponsors and a State Agency Representative complete the pre-approval visit together.

First Week Site Visit

Required for all closed enrolled sites

Complete a first week site visit form (handout)

Helps ensure operation gets off on the right foot

*Recommend this visit if new site supervisor or new Authorized Representative

Handout

First week site visits are required for all new closed enrolled SFSP sites. We recommend completing the first week site visit if you have a new site supervisor or new Authorized Representative for your SFSP operation.

Problem Sites

Integrity may be at risk:

- inadequate documentation related to daily production records/delivery tickets
- inadequate documentation related to daily meal counts
- operating outside approved meal times
- not counting meals at point of service
- health inspection violations

Different site supervisor

What is a problem site? ... One with inadequate documentation – for example, missing or incomplete daily production records or delivery tickets, or incorrect or inadequate documentation of daily meal counts, any site with a history of operating outside of approved meal service times, not counting meals at the point of service or a health inspection violation (like time-temperature abuse by allowing cold foods to be stored above 40 degrees farenheit). Completing this first week site visit is a great opportunity to ensure operation is off to a good start and helps ensure sites are operating within regulatory requirements that allow meals to be claimed for reimbursement.

Although not necessarily indications of any problems, turnover in site supervisors from year to year would be an indication that first-week site visits need to be completed by Sponsors.

Second Site Visit

Require of ALL sites

Must be done any time in first four weeks of operation

Helps identify and correct issues that may arise with site operation

Operate less than four weeks? Still conduct this review. 7 CFR 225.15(d)(3)

Handout

All sponsors are REQUIRED to complete a site visit in the first four weeks of operation. This, too, is an opportunity to correct any operational problems and to ensure program compliance for the remaining weeks of SFSP operation. If your enrolled program operates fewer than four weeks, this review is still required to be conducted.

Racial Ethnic Data Form

Visual identification to determine a participant's racial/ethnic category

Include participants in the group to which he or she appears to belong, identifies with, or is regarded as a member of by the community

Handout

Also required of sponsors is the completion of the racial/ethnic data form provided by NDE; this data is gathered just one during the summer feeding operation. Sponsors or site staff should use visual identification to determine a participant's racial/ethnic category. For collection purposes, a participant may be included in the group to which he or she appears to belong, identifies with, or is regarded as a member of by the community.

Potential Beneficiary Data

Identify other federal agencies providing funds

Identify issues of civil rights noncompliance

How did you reach out to grassroots community organizations to let minority participants know about your summer feeding?

Handout

Lastly, the potential beneficiary data form gathers information on the sponsor's requirements of children for participation SFSP, other federal agencies providing funds to the sponsor, issues of non-compliance with civil rights laws, and outreach efforts to minority organizations to communicate the opportunity to attend SFSP sites.

All of the required forms mentioned are available for download.

Agenda

Closed enrolled sites & eligibility

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Procurement & Reimbursement

Staff Training

Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations located at 2 CFR Part 200 as well as 7 CFR Part 225 Summer Food Service Program regulations. (Note: Part 3016 and Part 3019 have been replaced by 2 Part 200.)

Three types:

- Micro-purchase
- Small Purchase
- Large Purchase

Sponsor must create and maintain purchasing plan

Regulations regarding procurement can be found in 2CFR Part 200 and 8 CFR part 225. There are three basic types that sponsors tend to use: micro-purchases, small purchases and large purchases. We'll discuss each of these three types in the coming minutes. And no matter which of the three types of procurement you do, you must maintain a purchasing plan that you follow. let's look at an example quickly...

Purchasing Plan

- Plan procurement by forecasting meal counts with # new and returning sites
- 2. Plan meals to meet meal pattern through cycle menu for all meals served
- 3. Plan orders based on menu items and # meals and order frequency
- 4. Solicit bids from vendors
 - a. Delivery schedules
 - b. Local foods

Everyone's purchasing plan should include these basics: forecast meal counts to take into account the number of new and returning sites; plan meals to meet meal pattern by using a cycle menu for all meal types your sites serve; plan order based on menu item and the number of meals and how frequently you can order or receive deliveries form your vendor or supplier; finally, solicit bids from vendors making sure to account for delivery schedules to ensure they meet your needs and inclusion of local foods, as we know it supports the local economy and often provides the freshest, best-tasting items.

Select products that meet site needs and appeal to children (better participation, less food waste)

Procuring locally: definition varies based on many factors

Ask vendor to include locally-sourced meal items (origin on labels)

Still must maintain fair and open competition

Regardless of the type of procurement you do, your priority should be to purchase foods that meet your sites' needs and that are appealing to children. We always want to keep the bottom line in mind, which include minimizing food waste and enhancing participation, which makes your site/sponsor operation most financially viable and sustainable.

Procuring locally may be one strategy to offer foods that children enjoy - often these options are fresher, more ripe, opportunity to learn from local producer about where their foods come from.

Local procurement varies based on seasonality of foods/produce and availability of foods in an area.

Fair and open competition: all suppliers are offered a chance to sell to you; not ALWAYS using the same supplier/vendor

Micro-purchase (under \$3,500): no formal price quote

- Price is reasonable
- Business distributed equitably amongst suppliers
- No formal bidding required

Small purchase: less than \$50,000

- Must get three bids
- *No bid required if contracting with School Food Authority

Sponsors can purchase foods or supplies in a variety of ways and the regulations for each depends on the purchase amount and the sponsor's purchasing plan. We'll simply touch the surface of the three types of purchases: micro-purchases are those less than \$3,500- they do NOT require formal bidding but must document equitable distribution of business to all qualified suppliers and must show that reasonable price was paid. Small purchases are those amounts over \$3,500 but less than \$50,000 (which likely applies to sponsors who keep food service vendors; some larger sponsors may have purchases list large despite self-preparing their SFSP meals); these purchases DO require documentation that at least three bids were received, but not through the IFB or RFP process. But in the case that the contractor is a school food authority, the SFSP sponsor does NOT need to complete the bidding process.

Large purchase (\$50,000 or greater): requires formal procurement (IFB, RFP) of Food Service Management Company (FSMC)

- Invitation for a bid (IFB) or Request for Proposal (RFP)
- Public announcement
- Submit bid to State Agency (SA) for approval before accepting
- Copy of final contract and all bids to SA

If you contract with a Food Service Manage Company for your School meals program and have already included the Ssummer food service program in that contact you do not have to conduct additional procurment requiremnts.

For purchases larger than \$50,000, typically with a Food Service Management Company, formal procurement is required and completed through and IFB or RFP. And IFB is a fixed price contract awarded to lowest bid that complies with all terms and conditions. On the other hand, an RFP solicits responses for competitive negotiation; the vendor responses are scored and contract is awarded by scoring keeping in mind that price is still primary consideration for contract award. These contracts must be approved by NDE before the sponsor and vendor can sign. In the case that this contract is with a vendor that supplies meals, the agreement must include a cycle menu, food specifications, a statement of SFSP compliance, special meal requirements and site locations and estimated number of meals - all of which must be included when submitted to NDE for review.

Contracting with FSMC requires documented health inspection

FSMC maintains all food service operation records

Disallowances:

- meals not unitized or not served as a single unit
- spoiled
- deliver meals outside designated delivery time
- serve meals outside approved timeframe
- serve meals in excess of approved level

In order for a sponsor to contract with a Food Service Management Company, the FSMC must have documented current health inspection.

The FSMC is required to maintain all food service operation records (e.g. receipts and production records).

There are a few instances in which a sponsor would not pay a FSMC for meals provided, including: meals not unitized or not served as a single unit, spoiled meals, delivery of meal outside delivery time specified in contract, service ofmeals outside approve dtimefram and service of meals in excess of approved level.

Contracts with FSMCs

Final contracts must include:

- cycle menu
- food specs
- statement of SFSP compliance
- special meal requirements
- site locations and estimated number meals daily

If a SFSP sponsor contracts with a food service management company, that final contract must include a cycle menu, food specifications, a statement of SFSP compliance, adherence to special meal requirements and site location and estimated number of meals to be provided daily.

Allowable Program Costs

Operating costs (7 CFR 225.2 definitions and FNS Instruction 796-4, Rev. 4):

- costs of food used
- non-food supplies
- space for food service
- meals served to adult volunteers or paid staff who work directly with meal service
- *Adults not involved in meal service must pay Sponsor for meals or Sponsor covers that cost through non federal funds(e.g. grant funding)

Sponsors must also abide by the regulatory requirements of allowable costs, which are categorized in one of two ways: operating and administrative. Taking a closer look at allowable operating costs, we see that allowable expenses include the cost of food and non-food supplies for preparation and service of meals, payment for space of food service and any meals served to adults volunteers or paid staff who work DIRECTLY with meal service. Cannot pay the administrative assistance who works in the office and completes the monthly claim — he/she is not involved in serving children food.

Also, please note that adults NOT involved in meal service MUST pay the sponsor for any meals eaten. This could be a parent or grandparent accompanying a child, for example. Funds for providing meals to these individuals over 18 years of age who are NOT involved in meal service is NOT allowed to be paid for with any SFSP funds.

Allowable Program Costs

Administrative costs (7 CFR 225.2 definitions and FNS Instruction 796-4, Rev. 4):

- planning, organizing and adminstering the program Two levels:

- higher rate: self-prep meals or rural

- lower rate: all others

Summer Food Service Program - 2015				
	Operating Costs	Administrative Costs		
		Rural or self- preparation sites	Other types of sites	
Breakfast	\$1.94	\$.1925	\$.1525	
Lunch or Supper	\$3.39	\$.3550	\$.2950	
Snacks	\$.79	\$.0975	\$.0750	

Included in program costs are the administrative ones related to planning, organizing and adminstering the program. This could include the payment of staff to do outreach, maintain records and file claims for reimbursement. There are two levels of administrative reimbursement: the higher level applies to sponsors who exist in rural areas and/or prepare their own food for meals; the second, lower, level applies to sponsors who exist in urban areas and/or receive vended meals.

Allowable Program Costs

Sponsors must use all program reimbursement to:

- pay for meals, staffing
- improving SFSP operation
- use as start-up funds for next year's operation
- transfer to another USDA Child Nutrition Program (CACFP, NSLP)

If not used, State Agency will collect excess funds

Sponsors must use all of the administrative and operating funds for the provision of meals, to pay staff to administer and run the program, to improve their SFSP operation – which could include purchase of a holding equipment to maintain safe food, or to provide higher quality foods like more fresh fruits and vegetables, or to be held for program start-up for the following summer (which likely applies to expanding meal service to more sites), and can even be put toward funding another USDA child nutrition program – NSLP or CACFP. If these funds are not used and there is an exceptionally large excess remaining, the funds must be returned to the USDA and will be collected by the State Agency.

Unallowable Costs

Unserved meals

Meals not meeting meal pattern (missing a component)

Meals served off-site

Foods not used for meal service (e.g. coffee for staff; dessert for children)

Meal served to adults not involved in food service

Spoiled or damaged meals

Sponsors are NOT allowed to use SFSP funds to pay for unserved meals – if a complete meal is not served to a participant, then it CANNOT be claimed for reimbursement. Any meal missing a required component may not be paid for using program funds and may not be claimed for reimbursement. Meals served off-site are not allowed and neither are foods not used in food service, like coffee for site staff, for example. Again, program funds cannot be used to provide food to adults who are NOT involved in food service. Finally, spoiled or damaged meals are not an allowable cost and may not be paid for with program funds.

Reimbursement

Based on # meals served multiplied by the sum of administrative & operating rates

*Reimbursement allowed only with approved agreement/application with NDE

Operating Costs	Administrative Costs (2 levels)	
Food	Self-preparation/rural sites	
Non-food supplies for food prep, service	All other site types	
Space for food service	Planning, organizing, administering the SFSP	

Reimbursement to sponsors, after they've served meals, is based on the number of meals served multiplied by the sum of applicable administrative and operating rates. Remember, a sponsor MUST have an approved application in order to claim meals for reimbursement.

FY2016 Reimbursement Rates

Summer Food Service Program - 2015				
	Operating Costs	Administrative Costs		
		Rural or self-preparation sites	Other types of sites	
Breakfast	\$1.94	\$.1925	\$.1525	
Lunch or Supper	\$3.39	\$.3550	\$.2950	
Snacks	\$.79	\$.0975	\$.0750	

This FY2016 reimbursement table shows the standard reimbursement rate for all sponsors for operating costs. The administrative costs vary depending on whether the sponsor is rural and/or self-prep or all other types like urban and/or has a vendor contract to provide meals.

Rural Designation Tool

Determination of rural sites

- impacts administrative reimbursement rate

USDA Rural Designation tool http://www.fns.usda.gov/rural-designation

*Purple = non-rural

In order to estimate your reimbursement based in part on your rural or urban status, you can access the rural designation tool.

Agenda

Closed enrolled sites & eligibility

Regulatory & Monitoring Requirements

Procurement & Reimbursement

Staff Training

Sponsor must ensure that site supervisors for ALL sites are trained annually

Identify program purpose

Stress importance of accurate records

For vended sites:

- what should be delivered
- delivery times
- properly storing meals
- time/temp procedures
- which meal(s) site can serve

It is the sponsor's responsibility to ensure that all site supervisors and site staff receive adequate training. Staff need to understand the purpose of the program and that accurate record keeping is imperative to continue site operation in order to feed children. Sites with meal service provided by a vendor must emphasize to site staff what exactly should be delivered by the vendor each day, what those times are, how to properly store meals delivered, including proper time and temperature procedures to ensure food safety, and which meals their site is approved to serve.

For self-prep sites:

- meal pattern requirements
- adjusting meal preparation based on typical participation

MUST keep daily records:

- production records, delivery tickets or cycle menu
- meal counts
- actual time spent preparing and/or serving meals
- handling discipline
- inclement weather policy
- trash removal

Sites that prepare meals themselves must train site staff on meal pattern requirements and adjusting meal preparation based on typical participation. All site staff must be trained on accurate record keeping, including completion of production records for self-prep sites and maintenance of delivery tickets or a copy of the cycle menu for vended sites. Staff must also know how to accurately complete meal count forms and how to document time spent doing meal service activities like preparing foods or preparing claims. These duties vary somewhat between closed sites and how they operate.

Communicate to staff:

- site must serve meals onnly during approved meal service time
- site must serve meals through the end of the approved meal service times
- Meals are allowed to be served to children enrolled in the program

It is important for sponsors to communicate clearly to site staff that the site meal service cannot begin before the meal service time that has been approved by NDE. Sites must also be available to serve meals through the end of the approved meal service time.

All meals served must include required meal components in minimum required quantities

Food not allowed to leave the approved SFSP meal service site

1 Milk	1 cup (8 oz)	Fluid milk
1 Fruit/Vegetable	1/ ₂ cup	Juice (100% juice) or fresh/frozen/canned fruit or vegetable
1 Grain	1 slice 1 serving 34 cup 12 cup 12 cup	Bread or Corn bread/biscuit/roll/muffin or Cold dry cereal or Hot cooked cereal or Pasta/noodles/grains (cooked)

All staff must ensure that meals claimed for reimbursement include all of the required components for that meal or snack. For example, staff must ensure that a participant receiving breakfast has been served all required components, including a fluid milk, fruit or vegetable item and grain (whole or enriched) in at least the minimum required portion sizes. If a child is served a meal missing a required component, then that meal is not allowed to be claimed for reimbursement.

Walking Grain or Apple:

- only ONE non-perishable grain or produce item allowed to leave approved meal service site

Examples:

- whole apple
- package of crackers
- package of pretzels pre-packaged baby
- carrots

NEVER allow perishable items like unopened milk, cheese, yogurt to leave site

There is one exception to the regulation that no meal components can leave the meal service site: the walking grain or apple flexibility can be used to allow ONE nonperishable grain or produce item to leave the meal service site. Examples include whole apples, a package of pretzels or crackers, or pre-packaged baby carrots. It is NEVER allowable for perishable items to leave the meal service site; this poses a food safety risk for whomever consumes the perishable item later and thus a liability risk for sponsors.

Civil Rights

<u>Civil rights</u> refers to the **rights of "personal liberty"** guaranteed by the 13th and 14th Amendments to the U.S. Constitution and Acts of Congress and to the fair and equitable treatment of all customers and employees.

All SFSP staff must also be trained in Civil Rights. It must be made clear to site staff what civil rights are. They are the **rights of "personal liberty"** guaranteed by the 13th and 14th Amendments to the U.S. Constitution and Acts of Congress and to the fair and equitable treatment of all customers and employees.

Civil Rights

<u>Discrimination</u> occurs when the civil rights of an individual are interfered with because of their membership in a particular group or class.

Discrimination is NOT allowed in any USDA child nutrition program, including SFSP.

<u>Discrimination</u> occurs when the civil rights of an individual are interfered with because of their membership in a particular group or class, and this is not allowed in any USDA child nutrition program.

Civil Rights

Please direct your staff to the Civil Rights Training provided by NDE:

http://www.education.ne.gov/ns/training/cacfp_alltraining.html

Civil Rights Training

Outline of Civil Rights Guidance to be in Compliance.pdf

USDA Civil Rights Requirements and Child Nutrition Program.ppt

Please present to your staff the "USDA Civil Rights Requirements and Child Nutrition Program" PowerPoint, which can be accessed from the web address in the middle of the screen.

Questions?

Contact NDE Nutrition Services

800-731-2233